

**Federal Defenders
OF NEW YORK, INC.**

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February 4, 2022

By ECF

Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Yenny Santos-Reynoso*, 21 Cr. 268 (LTS)

Dear Chief Judge Swain:

I write on consent (Assistant U.S. Attorney Kevin Mead) to respectfully request that the Court extend the motion schedule in this case by a period of 60 days to allow additional time for us to receive documents from the Executive Office for Immigration Review (“EOIR”). On October 18, 2021, the Government requested documents on our behalf from the EOIR that are relevant to our motion challenging the underlying deportation in this case. The Government has yet to receive any response.

The below table shows the current schedule, *see* Dkt. No. 22, and our proposed dates:

<u>Current Schedule</u>	<u>Proposed Dates</u>
Motion Deadline: February 4, 2022	April 7, 2022
Government Response: March 4, 2022	May 9, 2022
Defendant’s Reply: March 25, 2022	June 1, 2022
Conference: April 26, 2022 at 2:15 p.m.	TBD

If the Court grants the adjournment, I request that the Court exclude time under the Speedy Trial Act until the next conference date.

Honorable Laura Taylor Swain
November 22, 2021

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Re: *United States v. Yenny Santos-Reynoso*, 21 Cr. 268 (LTS)

Respectfully submitted,

/s/

Martin S. Cohen
Ass't Federal Defender
(212) 417-8737

cc: Kevin Mead, Esq.

The foregoing extension requests are granted and the Court adopts the proposed briefing schedule. The conference originally scheduled for April 26, 2022, is hereby rescheduled for July 7, 2022, at 2:15p.m. The Court finds pursuant to 18 USC section 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from speedy trial computations from today's date through July 7, 2022, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated above, including to allow defense counsel to review documents pertinent to the expected motion practice. Dkt. no. 23 resolved.

SO ORDERED.

2/2/2022

/s/ Laura Taylor Swain, Chief USDJ